

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA

FILED

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALYSSA LYNN TURNER,

Defendant.

FEB - 8 2022

PATRICK KEANEY
Clerk, U.S. District Court

By _____
Deputy Clerk

Case No. CR-21-270-JWD

SUPERSEDING INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

**MURDER IN INDIAN COUNTRY
[18 U.S.C. §§ 1111(a), 1151, & 1152]**

On or about July 2, 2021, within the Eastern District of Oklahoma, in Indian Country, the defendant, **ALYSSA LYNN TURNER**, a non-Indian, willfully, deliberately, maliciously, and with premeditation and malice aforethought, did unlawfully kill Emmett Carshall, an Indian, by shooting him with a firearm, in violation of Title 18, United States Code, Sections 1111(a), 1151, and 1152.

COUNT TWO

**USE, CARRY, BRANDISH AND DISCHARGE OF A FIREARM DURING AND IN
RELATION TO A CRIME OF VIOLENCE
[18 U.S.C. §§ 924(c)(1)(A)(i), (ii) & (iii)]**

On or about July 2, 2021, within the Eastern District of Oklahoma, the defendant, **ALYSSA LYNN TURNER**, did knowingly use, carry, brandish, and discharge a firearm during and in relation to a crime of violence, that is, Murder in Indian Country, as charged in Count One of this Indictment, for which she may be prosecuted in a court of the United States, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii) & (iii).

COUNT THREE

**CAUSING THE DEATH OF A PERSON IN THE COURSE OF A VIOLATION
OF TITLE 18, UNITED STATES CODE, SECTION 924(c)
[18 U.S.C. § 924(j)(1)]**

On or about July 2, 2021, within the Eastern District of Oklahoma, the defendant, **ALYSSA LYNN TURNER**, did knowingly use, carry, brandish, and discharge a firearm, to wit: one (1) One, Ruger LCP .380 caliber pistol, SN: 370-71023, during and in relation to a crime of violence for which she may be prosecuted in a court of the United States, that is, Murder in Indian Country, as set forth in Count One of this Indictment, and in the course of this violation caused the death of a person through the use of said firearm, which killing is a murder, as defined in Title 18, United States Code § 1111, in that the defendant, **ALYSSA LYNN TURNER**, did murder and unlawfully kill Emmett Carshall with a firearm, in violation of Title 18, United States Code, Section 924(j)(1).

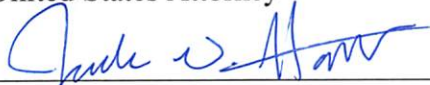
FORFEITURE ALLEGATION
[18 U.S.C. § 924(d) & 28 U.S.C. § 2461(c)]

The allegations contained in Counts One, Two, and Three of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the violations alleged in Counts One, Two, and Three of this Indictment, involving violations of Title 18, United States Code, Sections 924(c)(1)(A)(i)(ii)(iii), 924(j)(1), 1111(a), 1151, and 1152, the defendant, **ALYSSA LYNN TURNER**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms involved in the commission of the offenses, including, but not limited to: (1) One, Ruger LCP .380 caliber pistol, SN: 370-71023.

A TRUE BILL:

CHRISTOPHER J. WILSON
United States Attorney



JORDAN W. HOWANITZ, TN Bar # 035622
Assistant United States Attorney

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

s / Foreperson
FOREPERSON OF THE GRAND JURY